

[Parties and Counsel Listed on Signature Pages]

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY  
PRODUCTS LIABILITY LITIGATION

THIS DOCUMENT RELATES TO:

*People of the State of California, et al. v. Meta  
Platforms, Inc., et al.*

MDL No. 3047

Case Nos. 4:22-md-03047-YGR-PHK  
4:23-cv-05448-YGR

**META AND STATE AGS’  
STIPULATION AND [PROPOSED]  
ORDER EXTENDING CERTAIN  
EXPERT AND RELATED PRETRIAL  
DEADLINES AND OTHER PRETRIAL  
DEADLINES**

Judge: Hon. Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

1 Pursuant to Civil Local Rules 6-1(b), 6-2, and 7-12, the State Attorneys General (“State AGs”)  
2 and Defendants Meta Platforms, Inc.; Instagram, LLC; Meta Payments, Inc.; and Meta Platforms  
3 Technologies, LLC (collectively, “Meta,” and together, the “Parties”), through their undersigned counsel,  
4 hereby stipulate as follows:

5 1. By stipulation of the Parties and Order of the Court (ECF 1955 and 2139), the expert  
6 discovery deadlines relating to four AG-specific experts—Adam Alter, Ravi Iyer, Carl Saba, and Patrick  
7 McDaniel—were extended to the dates reflected in the second column of the chart below.

8 2. The Parties have met and conferred over several weeks and agree, subject to Court  
9 approval, to extend by approximately ten weeks the deadline for the Saba and McDaniel opening  
10 reports, to allow time for the production of certain discovery that the State AGs intend to incorporate  
11 into those reports—specifically, (1) certain data related to the average daily time spent by Meta’s users  
12 that the Parties have negotiated for Meta to produce, (2) certain updated cost data, (3) testimony related  
13 to the interpretation of data related to underage reporting and enforcement, and (4) geographic location  
14 data for accounts found in certain of Meta’s soft-matching tables. Meta estimates that it can produce  
15 this discovery according to the following schedule:

- 16 a. Testimony on Topic 7 of the State AGs’ Fourth Amended Rule 30(b)(6) Notice: by no  
17 later than October 10, 2025.
- 18 b. Geographic location data for certain soft-matched accounts: September 26, 2025.
- 19 c. Average daily time spent data, samples of underlying data, and verified Interrogatory  
20 response: October 10, 2025.

21 3. The Parties also agree, subject to Court approval, to extend by approximately seven to  
22 eight weeks the deadlines for (a) Meta’s reports responsive to these two State AG expert reports; (b) the  
23 rebuttal reports corresponding to these two expert reports; and (c) the close of expert discovery as  
24 related to these two reports and any related responsive and rebuttal reports, as reflected in the chart  
25 below.

26 4. The Parties also agree, subject to Court approval, to extend by approximately three weeks  
27 the deadline for Meta’s reports responsive to the Alter report; (b) the rebuttal reports corresponding to  
28

1 this expert report; and (c) the close of expert discovery as related to this expert report and any related  
2 responsive and rebuttal reports, as reflected in the chart below.

3 5. Finally, in light of these agreed-upon extensions, the Parties further agree, subject to  
4 Court approval, to extend the deadlines for Rule 702 motions as to the four AG-specific experts named  
5 in paragraph 1 and dispositive motions as to the State AGs' claims.

6 6. This Court has previously extended expert report, Rule 702 motion, dispositive motion,  
7 and pretrial deadlines, on agreement of all parties to the MDL as part of an MDL-wide schedule  
8 extension, *see* ECF 1159, and again as to the four State AG-specific experts involved in this extension  
9 on agreement of the State AGs and Meta, *see* ECF 1955, with a later, further agreed-upon extension of  
10 expert report deadlines for Saba and McDaniel, *see* ECF 2139.

11 7. To the extent the discovery listed in paragraph 2 is not produced by October 10, 2025, or  
12 the productions are incomplete or incorrect, the Parties agree to promptly meet and confer regarding  
13 further adjustments to the expert discovery schedule, including the possible reduction of time within  
14 which Meta will have to serve responsive reports to the McDaniel and Saba opening expert reports.

15 8. Should all of the discovery described in paragraph 2 be produced prior to October 10,  
16 2025, then the schedule will be advanced accordingly per the timetable in the chart below.

17 9. Should the State AGs serve the Saba or McDaniel opening expert reports prior to  
18 November 21, 2025, then the schedule will be advanced accordingly per the timetable in the chart  
19 below.

20 10. Therefore, the Parties agree, subject to the Court's approval, that the following deadlines  
21 will apply:

Event	Current Deadline	Proposed Deadline
Exchange Preliminary Witness Lists	September 10, 2025	September 24, 2025 (for Meta witnesses only; Parties to meet and confer immediately following October 24, 2025 CMC regarding

Event	Current Deadline	Proposed Deadline
		timing for exchange of preliminary witness lists for State witnesses) <sup>1</sup>
Non-Case Specific and Causation Experts: Plaintiffs' Opening Reports	<b>August 1, 2025</b> (for the opening reports of Alter and Iyer) <b>September 12, 2025</b> (for the opening reports of McDaniel and Saba)	N/A (already passed) <b>November 21, 2025</b> (for the opening reports of McDaniel and Saba), <i>or approximately 6 weeks after production of complete data</i>
Supplemental Opening Expert Report of Patrick McDaniel	<b>September 19, 2025</b>	<b><i>Deadline vacated in light of later proposed opening report deadline above</i></b>
Non-Case Specific and Causation Experts: Defendants' Responsive Reports	<b>September 26, 2025</b> (for Meta's responsive reports to the Alter and Iyer reports) <b>October 24, 2025</b> (for Meta's responsive reports to the McDaniel and Saba reports)	<b>September 26, 2025</b> (for Meta's responsive reports to the Iyer report) <b>October 17, 2025</b> (for Meta's responsive reports to the Alter report) <b>December 19, 2025</b> (for Meta's responsive reports to the McDaniel and Saba reports), <i>or approximately 4 weeks after Opening Reports</i>
Non-Case Specific and Causation Experts: Plaintiffs' Rebuttal Reports	<b>October 24, 2025</b> (for the State AGs' rebuttal reports in response to Meta's responsive reports to the Alter and Iyer reports) <b>November 14, 2025</b> (for the State AGs' rebuttal reports in response to Meta's responsive reports to the McDaniel and Saba reports)	<b>October 24, 2025</b> (for the State AGs' rebuttal reports in response to Meta's responsive reports to the Iyer report) <b>November 21, 2025</b> (for the State AGs' rebuttal reports in response to Meta's responsive reports to the Alter report) <b>January 16, 2026</b> (for the State AGs' rebuttal reports in response to Meta's responsive reports to the McDaniel report), <i>or approximately 4 weeks after Responsive Reports</i> <b>January 23, 2026</b> (for the State AGs' rebuttal reports in response to Meta's responsive reports to the Saba report), <i>or approximately 5 weeks after Responsive Reports</i>
Close of Expert Discovery	<b>November 7, 2025</b> (for depositions of Alter, Iyer, Meta's	<b>November 7, 2025</b> (for depositions of Iyer, Meta's responsive experts, and any AG rebuttal experts)

<sup>1</sup> The term "Meta witnesses" refers to current and former employees of Meta. The term "State witnesses" refers to current and former employees of State AGs and state agencies. See ECF 1696.

Event	Current Deadline	Proposed Deadline
	<p>responsive experts, and any AG rebuttal experts)</p> <p><b>December 5, 2025</b> (for depositions of McDaniel, Saba, Meta's responsive experts, and any AG rebuttal experts)</p>	<p><b>December 19, 2025</b> (for depositions of Alter, Meta's responsive experts, and any AG rebuttal experts)</p> <p><b>January 30, 2026</b> (for depositions of McDaniel, Saba, Meta's responsive experts, and any AG rebuttal experts), <i>or approximately 1 to 2 weeks after Rebuttal Reports</i></p>
Dispositive and Rule 702 (Daubert) Motions: Opening Briefs	<p><b>December 12, 2025</b> (for (a) Meta's and the State AGs' dispositive motions as to the State AGs' claims and Meta's defenses to those claims and (b) Meta's and the State AGs' Rule 702 motions as to the State AGs' four AG-specific experts and Meta's responsive experts), <i>or 4 weeks after the Close of Expert Discovery, whichever is sooner</i></p>	<p><b>January 30, 2026</b> (for (a) Meta's and the State AGs' dispositive motions as to the State AGs' claims and Meta's defenses to those claims and (b) Meta's and the State AGs' Rule 702 motions as to Alter and Iyer, Meta's responsive experts, and any AG rebuttal experts)</p> <p><b>February 13, 2026</b> (for Meta's and the State AGs' Rule 702 motions as to McDaniel and Saba, Meta's responsive experts, and any AG rebuttal experts), <i>or 2 weeks after the Close of Expert Discovery as to McDaniel and Saba</i></p>
Dispositive and Rule 702 (Daubert) Motions: Opposition Briefs	<p><b>January 23, 2026</b> (for (a) the State AGs' and Meta's oppositions to dispositive motions as to the State AGs' claims and Meta's defenses to those claims and (b) the State AGs' and Meta's oppositions to Rule 702 motions as to the State AGs' four AG-specific experts and Meta's responsive experts), <i>or approximately 4 weeks after Opening Briefs, whichever is sooner</i></p>	<p><b>February 27, 2026</b> (for (a) Meta's and the State AGs' oppositions to dispositive motions as to the State AGs' claims and Meta's defenses to those claims and (b) Meta's and the State AGs' Rule 702 oppositions as to Alter and Iyer, Meta's responsive experts, and any AG rebuttal experts)</p> <p><b>March 6, 2026</b> (for Meta's and the State AGs' Rule 702 oppositions as to McDaniel and Saba, Meta's responsive experts, and any AG rebuttal experts), <i>or 3 weeks after Opening Briefs as to McDaniel and Saba</i></p>
Dispositive and Rule 702 (Daubert) Motions: Reply Briefs	<p><b>February 20, 2026</b> (for (a) Meta's and the State AGs' replies in support of dispositive motions as to the State AGs' claims and Meta's defenses to those claims and (b) Meta's and the State</p>	<p><b>March 27, 2026</b> (for (a) Meta's and the State AGs' replies in support of dispositive motions as to the State AGs' claims and Meta's defenses to those claims and (b) Meta's and the State AGs' replies in support of Rule</p>

Event	Current Deadline	Proposed Deadline
	AGs' replies in support of Rule 702 motions as to the State AGs' four AG-specific experts and Meta's responsive experts), <i>or approximately 4 weeks after Opposition Briefs, whichever is sooner</i>	702 motions as to Alter and Iyer, Meta's responsive experts, and any AG rebuttal experts)  <b>March 27, 2026</b> (for Meta's and the State AGs' replies in support of Rule 702 motions as to McDaniel and Saba, Meta's responsive experts, and any AG rebuttal experts), <i>or 3 weeks after Opposition Briefs as to McDaniel and Saba</i>

**IT IS SO STIPULATED AND AGREED.**

Respectfully submitted,

DATED: September 10, 2025

By: /s/ Megan O'Neill

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**SIGNATURE CERTIFICATION**

Under Civ. L.R. 5-1(h)(3), I, Megan O'Neill, hereby attest that all signatories listed, and on whose behalf the filing is submitted, concur in this filing's content and have authorized this filing.

DATED: September 10, 2025

/s/ Megan O'Neill

1 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

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3  
4 DATED:

5 YVONNE GONZALEZ ROGERS  
6 UNITED STATES DISTRICT JUDGE  
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